

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

COUNSEL HOLDINGS, INC.

Plaintiff,

v.

**EVAN P. JOWERS, JOWERS
VARGAS LLC, JOWERS LANGER
LLC, AND LEGIS VENTURES (HK)
COMPANY LIMITED**

Defendants

Civil Action No 1:23-CV-711

**UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND TO MOTION
TO DISMISS**

On December 26, 2023, Defendants filed a Motion to Dismiss the Complaint in this case. Pursuant to Local Rule CV-7(D)(2), Counsel Holdings, Inc. (“**Plaintiff’s**”) response is due on Tuesday, January 9, 2024. Primary counsel for Plaintiff, Robert Kinney, is currently in Buenos Aires, Argentina, assisting with care for a hospitalized and critically ill family member. Due to uncertainty about when Mr. Kinney will be able to return to the United States, Plaintiff hereby requests a four-week extension until February 6, 2024, to respond to the Motion to Dismiss. Plaintiff has consulted with Mr. Jowers, who is unopposed to this request.

Dated: January 2, 2024

Respectfully Submitted,

/s/ Robert E. Kinney
Robert E. Kinney
Texas State Bar No. 00796888
Robert@KinneyPC.com

Robert E. Kinney
824 West 10th Street, Suite 200
Austin, Texas 78701
Tel: (512) 636-1395

Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com

THE MORT LAW FIRM, PLLC
501 Congress Ave, Suite 150
Austin, Texas 78701
Tel/Fax: (512) 865-7950

ATTORNEYS FOR PLAINTIFF